



STATE OF IDAHO

DEPARTMENT OF ENVIRONMENTAL QUALITY

300 West Main, Room 203 • Grangeville, Idaho 83530-1918 • (208) 983-0808

Dirk Kempthorne, Governor Toni Hardesty, Director

October 7, 2004
Red Pines Project
USFS
Rt. 2, Box 475
Grangeville, ID 83530

RE: Red Pines **DEIS**

Dear Sir or Madam:

The Idaho Department of Environmental Quality (DEQ) has reviewed the above referenced document and offers the following comments. It is noted this document references the South Fork Clearwater River TMDL document as a draft, please identify it as a final, approved by EPA (July, 2004).

The EIS needs to include (cite) the State water quality standards for sediment and temperature as identified in the Water Quality Standards and Wastewater Treatment Requirements, IDAPA 58.01.02.

Information contained with in the DEIS, as an example the 4th paragraph found in Appendix H-24, does not appear to be consistent with the intent of the TMDL and the agreement between State and Federal Agencies regarding this water body. Thus DEQ recommends the USFS to be consistent with the intent of the TMDL, that being a reduction in sediment loading and a reduction in water temperature.

The EIS needs to include language which specifically identifies how the proposed activities will cause no further impairment to existing beneficial uses.

DEQ understands and accepts that short term impacts may result from your proposed activities. DEQ accepts this provided the long term benefits are achieved within a 3-5 year period after these activities begin. This may require sediment and temperature reduction mitigation to begin concurrently with the project onset. DEQ recommends that the USFS document improvements on USFS property.

Response: 6-1 Aquatics.
Thank you for this correction.

Response: 6-2 Aquatics.
Section 3.5.2.2 of the FEIS cites the State of Idaho Water Quality Standards.

Response 6-3 Watershed, TMDL

The new Alternative E was primarily developed in response to the issue of upward trend in aquatic habitat carrying capacity. Consultation is underway with the IDEQ to determine whether the new Alternative E in the FEIS complies with the South Fork Clearwater River TMDLs.

Response 6-4 Aquatics and Fisheries.

The water quality analysis addresses compliance with Idaho State Water Quality Standards, including impairment to beneficial uses. Consultation with IDEQ on Alternative E will be used to further document a determination as to whether this alternative complies with the Standards.

Response 6-5.Implementation, restoration, watershed.

The Forest Service is committed to concurrent and timely implementation of the watershed restoration activities associated with this project. Funding will be aggressively sought through a variety of processes, including Forest Service appropriated funds.

It is DEQ's understanding that another and/or modified alternative is presently being written to address many of these concerns. DEQ supports your effort to provide another alternative which will be more consistent with the intent of the South Fork Clearwater River TMDL and the Forest Plan.

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DEQ notes and supports the USFS Watershed Restoration Projects identified in the DEIS (Table H-9). Upon completion of the aforementioned modified alternative, DEQ recommends the project types (P=proposed, D=discretionary) labeled "P" are all included and anticipates an increase in the "P" project types will be achieved.

Table H-9 prioritizes implementation goals as high, moderate, and low. In addition various improvements are listed as type "high" and mitigation type "high". Several of these high priorities require collaboration with private landowners or acquisition of "possible funds" to occur. DEQ understands the issues involved in working with private landowners and fund acquisition. Nevertheless, these particular high priorities may be a significant portion of the proposed in stream and riparian habitat restoration for this project. Thus DEQ strongly recommends these aspects of the restoration be pursued.

Thank you for the opportunity to comment. Should you need clarification or additional information, please don't hesitate to contact our office.

Sincerely,

/s/Daniel D. Stewart

Daniel D. Stewart

Aquatic Biologist

Cc: John Cardwell, DEQ
Mike McIntyre, DEQ

Response 6-6. Alternatives. Alternative E, which was created in response to comments from the DEIS, is described in Chapter II of the FEIS. The Water Quality section in Chapter III of the FEIS displays the effects analysis relating to the South Fork Clearwater River TMDL and the Forest Plan.

Response 6-7. Implementation.

In Alternative E, all of the watershed restoration projects on national forest lands are projected in the "proposed category". Projects on private lands or on county roads are considered "discretionary", since agreements need to be secured in order to implement these.

Response 6-8. Implementation.

The priorities of high, moderate and low are to be used as a guide in the order that improvements would be implemented. This was clarified in Appendix H of the FEIS.

Response 6-9 Thank you for your comments.